

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : **CRIMINAL NO.** _____

v. : **DATE FILED:** _____

ROBERT SCROGGINS-WAGNER : **VIOLATIONS:** **18 U.S.C. § 922(g)(5)**
(illegal alien in
possession of a
firearm - 1 count)
18 U.S.C. § 911
(false claim to United
States citizenship - 1
count)
18 U.S.C. § 1542
(passport fraud - 1
count)

I N D I C T M E N T

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about August 12, 2000, in Reading, in the Eastern District of Pennsylvania,
defendant

ROBERT SCROGGINS-WAGNER,

while being an alien illegally and unlawfully in the United States, knowingly possessed in and
affecting interstate commerce a firearm, that is, a Ruger pistol, Model P89, serial number 312-
83519.

In violation of Title 18, United States Code, Section 922(g)(5)(A).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 20, 2000, in Berks County, in the Eastern District of Pennsylvania and elsewhere, defendant

ROBERT SCROGGINS-WAGNER,

an alien and a native and citizen of the Dominican Republic, falsely and willfully represented himself to be a citizen of the United States.

In violation of Title 18, United States Code, Section 911.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 12, 1997, in Berks County, in the Eastern District of Pennsylvania, defendant

ROBERT SCROGGINS-WAGNER

willfully and knowingly made a false statement on an application for a passport to be issued in the name of "R.A.," with the intent to induce and secure the issuance of a passport under the authority of the United States, for his own use and the use of another, contrary to the laws regulating the issuance of passports and the rules prescribed pursuant to such laws.

In violation of Title 18, United States Code, Section 1542.

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney

